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5 *Attorney for ONORIO RAMOS*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

11 ONORIO RAMOS,

12 Plaintiff,

13 vs.

14 SABLES, LLC, a Nevada limited liability
15 company; WILMINGTON FINANCE, INC., a
16 Delaware corporation; DEUTSCHE BANK
17 NATIONAL TRUST COMPANY, AS TRUSTEE
18 FOR GSAMP TRUST 2007-HSBC1
19 MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2007-HSBC1; DOES I
through X and ROE BUSINESS ENTITIES I
through X, inclusive,

20 Defendants.

Case No.: 2:25-cv-00776-APG-BNW

**STIPULATION TO EXTEND TIME FOR
PLAINTIFF, ONORIO RAMOS, TO FILE
RESPONSE TO DEFENDANT,
DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR GSAMP
TRUST 2007-HSBC1 MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES
2007-HSBC1'S, MOTION TO DISMISS
AMENDED COMPLAINT [ECF 40]**

(FIFTH REQUEST)

21 Defendant, DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR
22 GSAMP TRUST 2007-HSBC1 MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-
23 HSBC1 ("Deutsche"), and Plaintiff, ONORIO RAMOS ("Ramos"), stipulate that Ramos shall have
24 up to and including Monday, November 3, 2025, to file his response to Deutsche's Motion to Dismiss
25 Amended Complaint, filed September 10, 2025, ECF 40, Deutsche shall have up to and including
26 November 14, 2025 to file its reply. Good cause exists for this extension because Plaintiff's counsel,
27
28

1 who is continuing to work remotely outside of the jurisdiction tending to a family health matter,
 2 experienced a full power outage on October 21, 2025 for approximately 6 hours which has caused
 3 incremental issues with his WORD program. Upon completing on October 29, 2025 Plaintiff's
 4 response to Defendant, Wilmington Finance, Inc.'s, motion to dismiss amended complaint [ECF 38]
 5 ---wherein the response was filed on October 29, 2025---, Plaintiff's counsel's WORD program
 6 unexpectedly "forced quit" and shut down and, therefore, impeded the finalization of Plaintiff's
 7 response for filing on October 29, 2025. Plaintiff's counsel, however, was optimistic that this issue
 8 would be resolved by October 30, 2025. Thus, this infelicitous optimism led counsel for the parties
 9 to submit on October 29, 2025 the stipulation to extend for one-day through October 30, 2025, which
 10 this Court granted. Unfortunately and excruciatingly, Plaintiff's counsel's computer is continuing to
 11 autonomously "force quit" and shut down the WORD program at this time as of October 30, 2025,
 12 which has impeded the finalization of Plaintiff's response for filing on October 30, 2025. A computer
 13 specialist to remedy this issue is scheduled for Friday, October 31, 2025.

14
 15 This stipulation is not intended to cause any delay or prejudice to any party and Plaintiff's
 16 counsel is appreciative of Deutsche counsel's professional courtesy and cooperation in stipulating
 17 herein.
 18

19 **IT IS SO STIPULATED.**

20 DATED this 30th day of October, 2025.

21
 22 **HONG & HONG LAW OFFICE**

23 /s/ Joseph Y. Hong

24 Joseph Y. Hong, Esq. (State Bar No. 005995)
 25 1980 Festival Plaza Drive, Suite 650
 Las Vegas, Nevada 89135

26 *Attorney for ONORIO RAMOS*

27 IT IS SO ORDERED:

28 Dated: November 3, 2025

AKERMAN LLP

/s/ Scott R. Lachman

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 Nicholas E. Belay, Esq. (State Bar No. 015175)
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*Attorneys for DEUTSCHE BANK NATIONAL
 TRUST COMPANY*


 ANDREW P. GORDON
 CHIEF UNITED STATES DISTRICT JUDGE